

EXHIBIT "2"

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NO. 1:23-cv-21855-RAR

DIN YUAN STEVEN SUN,
an individual,

Plaintiff,

v.

Defendant “1” a/k/a CHEN (JAY) HAN, an
individual; and JOHN DOES 1 – 20, as yet
unidentified Individuals, Business Entities and/or
Unincorporated Associations,

Defendants.

DECLARATION OF RODRIGO M. BARBARA

I, Rodrigo M. Barbara, declare and state as follows:

1. I am over the age of 18 years and I make this declaration of my personal knowledge. If called upon to do so, I could and would competently testify to the following facts set forth below.
2. I am a former law enforcement officer and I hold the credential of Certified Cryptocurrency Investigator (CCI) from the Blockchain Intelligence Group
3. Among other techniques, I utilize best-in-class investigative software to track and trace the movement of cryptocurrency transactions throughout the blockchain.
4. My forensic investigations have led to arrests, recovery of cryptocurrency acquired by theft and fraud, and seizure of illicit funds.

5. I am actively involved in assisting local, state, and federal law enforcement and regulatory agencies around the country to help track, trace and monitor illicit cryptocurrency activities. In the course of my career as a forensic investigator, I have cooperated with law enforcement investigations involving the Federal Bureau of Investigations, United States Secret Service, Department of Justice, Department of Homeland Security, and local law enforcement agencies.

6. I was retained by Plaintiff in this action to track the cryptocurrency that Plaintiff alleges was stolen from her.

7. I tracked the cryptocurrency to identified electronic cryptocurrency wallets at cryptocurrency exchanges: Binance, FTX, OKX, and Kraken (“Defendant’s Crypto Wallets”) as alleged in Plaintiff’s Complaint [DE 1] at ¶¶ 29 - 33

8. From before and after the filing of Plaintiff’s Complaint I have used all tools available to me to attempt to secure viable contact information for the Defendant. I did not have success except for tracking the Crypto Wallets where Defendant can be served.

9. The structure and methods of communication and electronic transfer described in Plaintiff’s Complaint is now common and unfortunately growing. I am aware of, have seen, and have worked on dismantling many similar schemes.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 30, 2023.

By: 
Rodrigo M. Barbara



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